

The NutraSweet Company

2600 Bond Street, University Park, Illinois 60466
Telephone: 708/534-1030



November 18, 1991

Attn: Compliance Assurance Section
IEPA, Division of Water
Pollution Control
2200 Church Hills Road
P. O. Box 19276
Springfield, IL 62794-9276

Dear Sirs:

Enclosed is the NutraSweet Company's October discharge and Deer Creek monitoring report, per Special Condition 2, of the IEPA Water Pollution Control Permit, number 1988-1686-1.

If you have any questions pertaining to the enclosed report, don't hesitate to call me at (708) 534-4308.

Respectfully Submitted

Randy Parson
Environmental Coordinator

RP/ks

Enclosure
Ref: Log Number 1686-88-1
Permit Number 1988 EP-1686

The NutraSweet Company

2600 Bond Street, University Park, Illinois 60466
Telephone: 708/534-1030



October 10, 1991

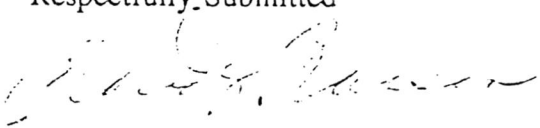
Attn: Compliance Assurance Section
IEPA, Division of Water
Pollution Control
2200 Church Hills Road
P. O. Box 19276
Springfield, IL 62794-9276

Dear Sirs:

Enclosed is the NutraSweet Company's September discharge and Deer Creek monitoring report, per Special Condition 2, of the IEPA Water Pollution Control Permit, number 1988-1686-1.

If you have any questions pertaining to the enclosed report, don't hesitate to call me at (708) 534-4308.

Respectfully Submitted


Randy Parson
Environmental Coordinator

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The NutraSweet Company
Deer Creek Monthly Summary Report
SEPTEMBER 1991

	Gauge #1	Gauge #4	Gauge #7
CHLORIDE (mg/l)			
Avg.	13 mg/l	248 mg/l	175 mg/l
Max.	19 mg/l	310 mg/l	340 mg/l
SODIUM (mg/l)			
Avg.	16 mg/l	269 mg/l	160 mg/l
Max.	19 mg/l	370 mg/l	290 mg/l
SULFATE (mg/l)			
Avg.	24 mg/l	163 mg/l	109 mg/l
Max.	42 mg/l	223 mg/l	183 mg/l
TDS (mg/l)			
Avg.	366 mg/l	1110 mg/l	740 mg/l
Max.	520 mg/l	1440 mg/l	1240 mg/l

The NutraSweet Company
Effluent Monthly Summary Report
SEPTEMBER 1991

SEPT. 1991	Total Flow(gpd)	Cl- (ppd)	Sulf (ppd)	TDS (ppd)	Sodium (ppd)
Avg.	85,859	1,451	985	7,345	1,731
Max.	122,060	1,790	1090	9,850	2,260

The NutraSweet Company

2600 Bond Street, University Park, Illinois 60466
Telephone: 708/534-1030



September 12, 1991

Attn: Compliance Assurance Section
IEPA, Division of Water
Pollution Control
2200 Church Hills Road
P. O. Box 19276
Springfield, IL 62794-9276

Dear Sirs:

Enclosed is the NutraSweet Company's August discharge and Deer Creek monitoring report, per Special Condition 2, of the IEPA Water Pollution Control Permit, number 1988-1686-1.

If you have any questions pertaining to the enclosed report, don't hesitate to call me at (708) 534-4308.

Respectfully Submitted

Randy Parson
Environmental Coordinator

RP/ks

Enclosure

Ref: Log Number 1686-88-1
Permit Number 1988 EP-1686

The NutraSweet Company
Deer Creek Monthly Summary Report
AUGUST, 1991

	Gauge #1	Gauge #4	Gauge #7
CHLORIDE (mg/l)			
Avg.	24 mg/l	272 mg/l	187 mg/l
Max.	58 mg/l	320 mg/l	300 mg/l
SODIUM (mg/l)			
Avg.	25 mg/l	285 mg/l	211 mg/l
Max.	47 mg/l	340 mg/l	280 mg/l
SULFATE (mg/l)			
Avg.	36 mg/l	192 mg/l	160 mg/l
Max.	52 mg/l	230 mg/l	210 mg/l
TDS (mg/l)			
Avg.	388 mg/l	1202 mg/l	948 mg/l
Max.	720 mg/l	1500 mg/l	1400 mg/l

The NutraSweet Company
Effluent Monthly Summary Report
AUGUST 1991

AUGUST 1991	Total Flow (gpd)	Cl- (ppd)	Sulf (ppd)	TDS (ppd)	Sodium (ppd)
Avg.	108,943	1,315	767	5,785	2,307
Max.	201,050	2,533	1510	14,763	6,536

ualization Basin Daily S... For 1991

Date	[Flow Into Plant]		Flow Into Pond		[Flow to CWC] Total Basin (gpd)	EFFLUENT														Pond PH	Concentrate Hauled	Raffinate Hauled	Virgin Product	
	Total Water Use (gpd)	Influent To Pond (gpd)	E-Col Bottom Volume (gpd)	Raw Dist Volume (gpd)		BOO (mg/l)	BOO* (ppd)	COO (mg/l)	COO (ppd)	ToI (ppm)	ChI (mg/l)	ChI (ppd)	Sulf (mg/l)	Sulf (ppd)	TSS (mg/l)	TSS (ppd)	TDS (mg/l)	TDS (ppd)	SODI (mg/l)					SODI (ppd)
10/01/91	13,000		1		81,000	2,290	1,548	3,400	2,298	0.12	1,550	1,048	990	669	400	270	4,600	3,109	1,030	696	8.9	10,000	0	0.0
10/02/91	106,000		0		62,200	1,430	742	3,300	1,713	0.00	1,400	727	990	514	300	156	4,400	2,284	1,410	732	8.3	10,000	0	0.0
10/03/91	91,000		0		49,950	1,010	421	2,000	834	0.00	1,500	625	960	400	400	167	4,000	1,667	1,300	542	8.3	5,000	0	0.0
10/04/91	130,000		0		65,600	1,010	553	2,500	1,368	0.00					400	219					8.0	5,000	0	0.0
10/05/91	104,000		473		71,590	800	478	1,300	777	0.02					400	239					7.5	0	0	0.0
10/06/91	177,000		8,810		111,750	870	811	1,400	1,305	0.13					600	559					8.4	11,400	11,000	2120.0
10/07/91	188,000		12,181		114,610	1,000	956	2,000	1,913	0.00					600	574					8.8	48,500	5,400	8707.5
10/08/91	277,000		24,220		125,630	1,340	1,405	3,600	3,774	0.00	1,140	1,195	730	765	800	839	3,800	3,984	1,280	1,342	8.6	54,200	5,500	8550.0
10/09/91	299,000		21,464		119,390	1,540	1,534	3,200	3,188	0.01	1,370	1,365	770	767	500	498	4,400	4,383	1,430	1,425	8.6	58,500	5,500	6300.0
10/10/91	244,000		8,394		116,380	4,100	3,982	5,500	5,341	0.04	1,700	1,651	810	787	400	388	5,600	5,438	1,730	1,680	8.8	37,800	5,500	6921.8
10/11/91	259,000		18,551		58,220	4,060	1,972	4,200	2,040	0.00					800	389					8.4	42,800	5,500	8750.0
10/12/91	270,000		11,914		42,990	1,800	646	2,650	951	0.02					1,600	574					8.4	37,100	5,500	7825.0
10/13/91	285,000		18,762		27,980	1,790	418	2,850	665	0.04					800	187					8.8	47,800	5,500	9430.0
10/14/91	242,000		19,275		30,460	1,670	424	3,300	839	0.05					1,200	305					8.3	52,100	5,500	5880.0
10/15/91	264,000		18,120		121,390	1,730	1,752	2,200	2,228	0.01	1,600	1,621	1,200	1,216	1,000	1,013	6,800	6,888	1,600	1,621	8.3	47,800	5,500	8825.0
10/16/91	263,000		19,406		58,210	1,680	816	2,700	1,311	0.02	1,510	733	1,100	534	1,200	583	6,200	3,012	1,540	748	8.4	37,100	5,500	8150.0
10/17/91	267,000		19,314		109,580	1,450	1,326	2,800	2,560	0.07	1,440	1,317	1,030	942	200	183	6,000	5,486	1,520	1,390	8.5	47,800	11,000	8066.2
10/18/91	265,000		0		146,220	1,660	2,025	2,800	3,416	0.02					600	732					7.4	43,500	0	9207.2
10/19/91	249,000		27,951		129,410	1,600	1,728	2,450	2,646	0.36					200	216					7.4	31,400	11,000	9810.0
10/20/91	267,000		20,950		100,430	1,740	1,458	2,450	2,053	0.49					200	168					8.4	52,100	5,400	8130.0
10/21/91	261,000		20,680		143,920	1,810	2,174	2,900	3,483	0.04					400	480					8.3	63,500	5,500	9825.0
10/22/91	306,000	136,590	20,680		127,290	1,520	1,614	3,300	3,505	0.00	1,730	1,838	1,080	1,147	200	212	7,200	7,648	2,380	2,528	8.3	47,800	5,500	8917.2
10/23/91	303,000	138,180	20,930		112,780	1,580	1,487	3,100	2,917	0.01	1,720	1,619	1,070	1,007	1,000	941	6,600	6,211	2,370	2,230	7.2	48,500	5,500	9225.0
10/24/91	284,000	133,000	22,360		151,230	1,960	2,473	2,400	3,029	0.01	1,640	2,070	1,050	1,325	270	341	6,400	8,076	2,370	2,991	6.7	17,100	5,380	
10/25/91	268,000	152,730	21,800		171,940	1,580	2,267	2,800	4,017	0.00					400	574					6.7	43,800	5,500	
10/26/91	255,000	136,030	19,440		137,810	1,400	1,610	2,500	2,875	0.01					1,070	1,230					6.9	59,200	5,500	
10/27/91	278,000	172,590	21,290		158,700	1,700	2,251	4,000	5,297	0.01					930	1,232					7.2	52,100	5,500	
10/28/91	270,000	116,250	22,120		140,830	1,400	1,645	2,050	2,409	0.01					400	470					7.1	57,800	5,500	
10/29/91	277,000	142,210	21,260		153,250	920	1,176	2,450	3,133	0.02	1,340	1,714	900	1,151	530	678	5,400	6,905	1,540	1,969	7.2	47,875	5,500	
10/30/91	292,000	163,040	14,640		197,730	1,630	2,689	4,600	7,590	0.01	1,320	2,178	910	1,501	740	1,221	6,000	9,900	1,620	2,673	7.1	58,500	5,500	
10/31/91	253000	120,110	840		183,450	780	1,194				1,320	2,021	720	1,102	1800	2,755	5000	7,654	1400	2,143	7.1	54,200	5,500	
TOTALS	7,054,000	1,290,620	454,986		3,238,470		44,384		79,476							15,637						1,176,075	148,180	144,640
AVERAGE	235,133	143,402	15,166		107,949	1,669	1,479	2,890	2,649	0	1,497	1,407	971	909	618	521	5,529	5,357	1,651	1,612	8	39,203	4,939	6,289
MAXIMUM	306,000	172,590	27,951		197,730	4,100	3,982	5,500	7,590	0	1,730	2,178	1,200	1,501	1,600	1,232	7,200	9,900	2,380	2,991	9	63,500	11,000	9,825
MINIMUM	13,000	116,250	0		27,980	800	418	1,300	665	0	1,140	625	730	400	200	156	3,800	1,667	1,030	542	7	0	0	0
STD.DEV	14,458,133	2,320,812	953,455		6,635,729	50,079	91,680	82,590	162,201	2	21,057	22,904	13,541	14,655	20,658	34,732	82,129	90,841	24,811	27,342	222	2,479,053	317,799	305,393
OPERATING LIMITS							2500 ppd			1.00									9,000 Mo. Ave		6.5-9.0			
																			15,000 Daily Lim.					
PA PERMIT LIMITS							4170 ppd												13,228 Mo. Ave		6.0-9.5			
																			24,471 Daily Lim.					

WATER ATTACHMENT III

Equalization Basin Daily Sampling For 1991

Date	Total Water Use (gpd)	E-Col Bottom Volume (gpd)	Raw Dist Volume (gpd)	Total Basin Flow (gpd)	EFFLUENT																Pond PH	Centrate Hauled	Raffinate Hauled	Virgin Product
					BOD (mg/l)	BOD (ppd)	COD (mg/l)	COD (ppd)	Tol (ppm)	Chl (mg/l)	Chl (ppd)	Sulf (mg/l)	Sulf (ppd)	TSS (mg/l)	TSS (ppd)	TDS (mg/l)	TDS (ppd)	SODI (mg/l)	SODI (ppd)					
09/01/91	306,000	22,843		61,830	1,490	769	2,550	1,316	0.24						800	413					7.0	43,500	11,000	11022.4
09/02/91	291,000	22,370		57,040	1,620	771	3,000	1,428	0.14						1,000	476					7.0	49,200	5,500	8800.0
09/03/91	316,000	22,490		59,360	1,600	793	2,450	1,214	0.20	1,790	887		950	471	1,000	495	7,800	3,864	1,990	986	6.8	57,000	5,500	9475.0
09/04/91	288,000	23,612		96,510	1,050	846	1,400	1,127	0.58	1,570	1,264		1,090	878	1,100	886	6,700	5,396	1,610	1,297	7.0	34,200	5,500	8575.0
09/05/91	300,000	22,498		94,580	1,460	1,152	2,300	1,815	0.06	1,400	1,105		930	734	700	552	5,140	4,057	1,700	1,342	7.0	38,500	5,500	10025.0
09/06/91	301,000	24,064		106,170	1,580	1,400	2,550	2,259	0.63						700	620					7.2	39,900	5,500	7835.0
09/07/91	309,000	24,635		98,960	1,770	1,462	2,750	2,271	0.13						740	611					7.1	34,200	5,500	10355.0
09/08/91	309,000	24,787		94,900	2,020	1,600	3,000	2,376	0.35						500	396					7.0	39,900	5,500	8275.0
09/09/91	295,000	23,931		78,840	2,020	1,329	3,300	2,171	0.41						500	329					7.0	38,500	5,500	8070.3
09/10/91	310,000	25,000		43,040	1,920	690	2,800	1,006	0.06	1,422	511	1,010	363	200	72	7,000	2,514	1,620	582	7.0	39,900	5,500	8950.0	
09/11/91	284,000	23,923		78,610	1,680	1,102	3,250	2,132	0.16	1,340	879	990	649	400	262	8,100	5,313	1,580	1,036	7.0	38,700	5,500	9075.0	
09/12/91	294,000	23,679		80,000	1,920	977	2,750	1,343	0.07	1,300	844	1,040	577	400	157	4,860	4,444	1,610	789	7.0	47,800	11,000	9174.0	
09/13/91	288,000	23,841		84,850	1,710	1,211	1,800	1,274	0.06						400	283					7.0	33,500	5,300	9000.0
09/14/91	309,000	24,854		85,430	2,070	1,476	2,700	1,925	0.59						400	285					7.2	34,200	5,500	8475.0
09/15/91	309,000	24,584		85,430	1,840	1,312	2,900	2,067	0.31						1,500	1,069					7.2	34,200	5,500	8038.3
09/16/91	296,000	24,325		83,670	1,930	1,347	2,700	1,885	0.00						1,600	1,117					6.4	42,800	5,500	6261.1
09/17/91	271,000	22,224		72,000	1,600	961	2,400	1,442	1.00	1,340	805	1,060	637	1,300	781	7,600	4,566	1,620	973	7.1	32,100	5,500	6183.8	
09/18/91	293,000	22,795		57,800	2,170	1,047	1,800	868	0.22	1,300	627	1,050	506	1,100	531	7,600	3,666	1,570	757	8.0	37,800	5,500	9935.0	
09/19/91	287,000	24,029		63,180	1,400	738	2,200	1,160	0.00	1,400	738	1,040	548	900	474	6,000	3,163	1,440	759	8.8	42,800	5,500	8780.0	
09/20/91	268,000	24,212		46,250	2,210	853	2,700	1,042	0.31						640	247					8.8	27,800	0	6610.0
09/21/91	243,000	18,332		69,510	1,670	969	3,000	1,740	0.14						480	278					8.8	31,400	5,500	10149.1
09/22/91	290,000	90,080		114,590	1,460	1,396	3,500	3,347	0.11						480	459					8.2	32,100	5,500	9215.0
09/23/91	261,000	23,993		110,710	1,790	1,654	2,900	2,679	0.06						480	443					8.2	37,800	11,000	8905.0
09/24/91	287,000	22,959		120,340	2,540	2,551	3,100	3,113	0.07	1,600	1,607	840	843	400	402	7,200	7,230	2,140	2,149	8.4	48,500	5,500	9175.0	
09/25/91	292,000	24,047		118,680	1,990	1,971	3,700	3,664	0.06	1,420	1,406	840	832	320	317	7,800	7,724	2,260	2,238	8.6	48,500	5,500	8775.0	
09/26/91	253,000	23,090		122,060	2,260	2,302	3,500	3,565	0.08	1,620	1,650	780	794	530	540	8,800	8,963	2,380	2,424	8.5	42,800	5,500	7549.7	
09/27/91	265,000	23,633		108,260	2,440	2,204	3,300	2,981	0.00						100	90					8.7	27,100	5,500	9675.0
09/28/91	263,000	24,753		94,670	2,770	2,188	3,850	3,041	0.00						200	158					8.8	42,800	5,500	8325.0
09/29/91	298,000	23,181		121,950	3,500	3,562	4,000	4,070	1.24						200	204					8.8	31,400	5,500	6125.0
09/30/91	231,000	13,626		99,300	2,740	2,270	3,750	3,107	0.96						200	166					8.9	11,400	0	0.0
TOTALS	8,608,000	762,390		2,589,210		42,894		63,478								13,109						1,135,300	170,300	250,810
AVERAGE	286,933	25,413		86,307	1,941	1,430	2,863	2,116	0	1,465	1,015	968	649	639	437	7,466	5,120	1,785	1,276	8	37,843	5,677	8,360	
MAXIMUM	316,000	90,080		122,060	3,500	3,562	4,000	4,070	1	1,790	1,650	1,090	878	1,600	1,117	9,850	8,963	2,380	2,424	9	57,000	11,000	11,022	
MINIMUM	231,000	13,626		43,040	1,050	690	1,400	868	0	1,300	511	780	363	100	72	5,140	2,514	1,440	582	6	11,400	0	0	
STD.DEV	16,317,933	1,526,460		5,017,467	56,441	86,449	81,063	126,242	9	16,077	11,586	10,708	7,227	16,809	24,950	87,266	62,211	20,285	15,383	212	2,143,043	324,277	473,105	
OPERATING LIMITS						2500 ppd			1.00								9,000 Mo.Ave 15,000 Daily Lim.			6.5-9.0				
EPA PERMIT LIMITS						4170 ppd											13,228 Mo.Ave 24,471 Daily Lim.			6.0-9.5				

WATER ATTACHMENT III

WATER
ATTACHMENT II

Equalization Basin Daily Sampling For 1991

Date	Total Water Use (gpd)	E-Col Bottom Volume (gpd)	Raw Dist Volume (gpd)	Total Flow (gpd)	EFFLUENT																Concentrate Hauled	Raffinate Hauled	Virgin Product
					BOD (mg/L)	BOD (ppd)	COO (mg/L)	COO (ppd)	Tol (ppm)	Chl (mg/L)	Chl (ppd)	Sulf (mg/L)	Sulf (ppd)	TSS (mg/L)	TSS (ppd)	TDS (mg/L)	TDS (ppd)	SOCl (mg/L)	SOCl (ppd)	PH			
08/01/91	260,000	17,116		77,450	1,200	776	3,200	2,068	0.18	1,500	969	800	517	900	582	7,500	4,847	1,700	1,099	7.4	39,900	5,500	6732.9
08/02/91	302,000	16,977		80,250	1,400	937	7,300	4,888	0.26					700	469					7.3	34,200	5,500	9761.1
08/03/91	292,000	28,037		88,000	1,210	889	2,100	1,542	0.64					950	698					7.0	28,500	5,500	4565.4
08/04/91	296,000	57,889		79,530	1,340	889	1,900	1,261	0.22					850	564					7.2	28,500	5,500	0.0
08/05/91	263,000	58,593		96,140	1,410	1,131	2,125	1,705	0.38					950	762					7.3	68,500	5,500	7650.0
08/06/91	274,000	55,390		90,790	1,200	909	12,750	9,659	0.74	1,400	1,061	660	500	1,100	813	7,400	3,606	1,600	1,212	7.4	34,200	5,500	10100.0
08/07/91	275,000	42,928		81,280	1,060	719	2,000	1,356	0.36	1,420	963	850	576	1,000	678	7,300	4,951	1,600	1,085	7.4	57,000	5,500	11675.0
08/08/91	292,000	51,912		81,040	1,220	825	2,100	1,420	0.29	1,420	960	930	629	1,000	676	6,300	4,260	1,700	1,150	7.0	39,900	5,500	9500.0
08/09/91	265,000	48,404		56,080	800	374	3,600	1,685	0.20					200	94					7.4	45,600	5,500	8825.0
08/10/91	306,000	53,179		116,290	1,000	970	1,800	1,747	0.23					300	291					7.3	51,300	5,500	10379.8
08/11/91	299,000	53,257		106,280	890	789	3,500	3,104	0.32					700	621					7.4	39,900	5,500	8254.0
08/12/91	303,000	55,566		106,680	930	828	1,500	1,335	0.35					600	534					7.4	57,000	5,500	7675.0
08/13/91	311,000	59,594		68,690	800	459	2,200	1,261	0.12	1,520	871	850	487	900	516	5,700	3,267	1,440	825	7.6	45,600	5,500	10200.0
08/14/91	304,000	48,992		74,560	1,060	659	2,000	1,244	1.72	1,480	921	810	504	800	498	5,200	3,235	1,410	877	7.4	57,000	5,500	8725.0
08/15/91	331,000	19,948		107,020	1,440	1,286	2,200	1,965	0.88	1,510	1,348	1,010	902	800	714	5,400	4,822	1,480	1,322	7.2	39,900	5,500	8800.0
08/16/91	308,000	17,044		51,580	1,350	581	2,200	947	3.25					1,200	516					7.2	45,600	11,000	8600.0
08/17/91	312,000	21,814		85,300	1,040	740	2,050	1,459	0.08					1,000	712					7.2	39,900	5,465	9400.0
08/18/91	323,000	26,309		88,000	860	632	1,750	1,285	0.13					1,200	881					7.0	45,600	5,500	7750.0
08/19/91	277,000	26,400		83,050	780	541	1,300	901	0.47					1,000	693					7.2	39,900	5,200	7900.0
08/20/91	260,000	35,659		98,900	830	685	1,500	1,238	0.23	1,220	1,007	790	652	1,000	825	4,900	4,044	1,500	1,238	7.2	34,200	5,500	8779.4
08/21/91	273,000	30,490		105,240	820	720	2,050	1,800	0.19	1,240	1,089	830	729	1,000	878	5,200	4,566	1,500	1,317	7.4	39,900	5,450	8079.4
08/22/91	289,000	25,198		73,630	830	510	1,500	922	0.00	1,220	750	950	584	800	492	5,200	3,195	1,600	983	7.2	45,600	5,463	8675.0
08/23/91	294,000	25,564		60,610	1,120	566	2,200	1,113	0.00					800	405					7.2	45,600	5,500	8100.0
08/24/91	296,000	27,824		66,640	940	523	1,900	1,057	11.99					670	373					7.1	34,200	5,500	7125.0
08/25/91	305,000	26,842		77,100	900	579	1,600	1,029	0.24					800	515					7.2	45,600	5,500	8860.0
08/26/91	303,000	23,309		83,750	960	671	1,700	1,188	0.13					800	559					7.1	51,300	5,500	9800.0
08/27/91	333,000	21,106		94,730	1,000	790	1,800	1,423	0.13	1,420	1,122	1,040	822	970	767	6,600	3,195	2,000	1,581	7.0	50,700	5,500	8825.0
08/28/91	351,000	22,565		74,600	1,340	834	2,350	1,463	0.17	1,570	977	1,050	654	700	436	6,600	3,195	2,100	1,307	7.2	45,600	5,500	7800.0
08/29/91	297,000	23,058		56,270	1,290	606	3,100	1,456	0.14	1,790	840	1,090	512	600	282	6,700	3,195	2,200	1,033	7.0	45,600	5,500	8630.0
08/30/91	325,000	22,731		93,160	1,290	1,003	2,000	1,555	0.07					900	700					6.9	45,600	11,000	10254.0
08/31/91	333,000	23,469		79,170	1,400	925	2,500	1,652	0.09					1,000	661					6.8	38,800	0	9780.0
TOTALS	9,252,000	1,067,164		2,581,810		21,419		56,726						17,056							1,360,700	175,578	26140.0
AVERAGE	298,452	34,425		83,284	1,077	739	2,638	1,830	1	1,439	991	897	621	838	588	6,154	4,029	1,679	1,156	7	43,894	5,664	8,43
MAXIMUM	351,000	59,594		116,290	1,440	1,286	12,750	9,659	12	1,790	1,348	1,090	902	1,200	881	7,500	5,606	2,200	1,581	8	68,500	11,000	11,000
MINIMUM	260,000	16,977		51,580	780	374	1,300	901	0	1,220	750	660	487	200	94	4,900	3,195	1,410	825	7	28,500	0	0
STD.DEV	22,667	14,703		15,862	211	197	2,131	1,607	2	151	142	121	126	223	172	898	831	249	198	0	8,601	1,704	2,000

PERMIT LIMITS 4170 1.00 13,228 Mo. Ave 6-9.5
24,471 Daily Limit

MAR 29 1988

5HS-12

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. R. Heinz
Nutra Sweet Company
2600 Bond Street
University Park, Illinois 60466

Re: Notice of Violation
Nutra Sweet Company
ILD 980 793 020

Dear Mr. Heinz:

On February 2, 1988, the Jacobs Engineering Group Inc., representing the U.S. Environmental Protection Agency (U.S. EPA), conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above-referenced facility. The purpose of the inspection was to determine the compliance status of your facility with respect to the applicable hazardous waste management requirements of RCRA, including the land disposal restrictions of certain spent solvents. The land disposal restrictions became effective on November 8, 1986, (reference 51 Federal Register 40636: revisions to 40 CFR Parts 260-265, 268, and 270-271) and for "California List" hazardous wastes on July 8, 1987, (reference 52 Federal Register 25760: revisions to 40 CFR Parts 262, 264, 265, 268, and 270-271).

With respect to the land disposal restrictions (40 CFR 268) section of the inspection, your facility was found to be in violation of the following:

Failure to notify in writing for each shipment of F-solvent wastes the applicable treatment standard, U.S. EPA hazardous waste number, manifest number, and waste analysis data, if available as required by Section 268.7(a)(1).

A copy of the inspection report is enclosed for your records. Please submit to this office, within thirty (30) days of receipt of this Notice of Violation, documentation demonstrating that the above-cited violations have been corrected and indicating what measures have been initiated to assure future compliance. Failure to correct the violations may subject the facility to further Federal enforcement action.

If you have any questions regarding this correspondence, please contact Gertrud Matuschkovitz of my staff at (312) 353-7921.

Sincerely yours,

ORIGINAL SIGNED BY

WILLIAM E. MUNO

William E. Muno, Chief
RCRA Enforcement Branch

Enclosure

cc: Harry Chappel, IEPA w/ENCL
Glenn Savage, IEPA

5HS-12:GMATUSCHKOVITZ:3/11/88:ea

DISK #2

SEARCHED	INDEXED	SERIALIZED	FILED	APR 1 1988	APR 1 1988	APR 1 1988	APR 1 1988
CL	gm	P.S.D.	WEM	3/15/88	3/16/88	3/17/88	3/18/88

Hertud matusckovitz
P-571 916 652 5Hs 2
EPS#

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

U.S.G.P.O. 153-506

PS Form 3800, June 1985

Sent to	Mr. R. Heinz
Street and No.	2600 Bond Street
P.O., State and ZIP Code	University Park, IL 60466
Postage	\$ 1.08
Certified Fee	.75
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	70
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$ 3.03
Postmark or Date	

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. 2. Restricted Delivery
↑(Extra charge)↑

3. Article Addressed to:
Mr. R. Heinz
Nutra Sweet Company
2600 Bond Street
University Park, IL 60466

4. Article Number
P 571 916 652

Type of Service:
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature — Addressee

X

6. Signature — Agent

X

7. Date of Delivery

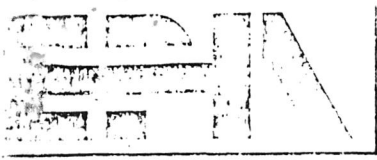
SP E Palmer

8. Addressee's Address (ONLY if requested and fee paid)

PS Form 3811, Mar. 1987

★ U.S.G.P.O. 1987-178-268

DOMESTIC RETURN RECEIPT



512/545-9780

1 01 S. First Street Ma, wood, IL. 60153

RECEIVED

MAR 16 1983

Refer to: 19707204 - Will County - Park Forest South/Searle
ILD980793020

E.P.A. — D.L.P.C.
STATE OF ILLINOIS

March 14, 1983

Mr. John D. Grove, Plant Manager
Searle Food Resources, Inc.
2600 Bond Street
Park Forest South, Illinois 60466

Mr. William L. Tolle, Manager
Environmental Engineering
Searle Chemicals, Inc.
Box 5110
Chicago, Illinois 60680

Gentlemen:

On February 24, 1983, representatives of the Illinois Environmental Protection Agency (IEPA) conducted an inspection of your facility. The purpose of the inspection was to determine your facility's compliance with the Environmental Protection Act, Ill. Rev. Stat. 1982, Ch. 111 1/2, pars. 1001 et seq., as amended, and regulations adopted by the Illinois Pollution Control Board. During the inspection the following apparent violations were observed:

Pursuant to 35 Ill. Adm. Code 725.116, the owner/operator is required to establish and maintain records relating to the training of personnel involved in hazardous waste management, including a description of the job title for each position at the site, a written job description, a description of training and records detailing the training given to each such individual. You are in apparent violation of 35 Ill. Adm. Code 725.116 for the following reasons: Written records were not available for all pertinent employees at the time of the inspection and the date(s) of training were not included in the records viewed.

The owner/operator must have a contingency plan at the facility. The contingency plan must address the actions to be taken by facility personnel in response to fires, explosions, or any unplanned release of hazardous waste or hazardous constituents to the environment. The plan must describe the arrangements agreed to by local police, fire departments, hospitals and emergency response teams. The names, addresses, and phone numbers of all persons qualified to act as emergency coordinators must be included in the plan. The contingency plan must list all emergency equipment at the facility, including the location, a physical description, and a brief summary of the capabilities of each item on the list. In facilities where evacuation could be necessary a plan describing evacuation routes and signals used to begin evacuation must be included in the contingency plan. These requirements are pursuant to Subpart D of 35 Ill. Adm. Code 725. You are in apparent violation of Subpart D of 35 Ill. Adm. Code 725 for the following reasons: The home address needs to be included with the Emergency Coordinator; and; the location, physical description, and brief summary of capabilities for all emergency equipment were not given.

II. BRIEFLY DESCRIBE SITE ACTIVITY

Searli is a generator of spent toluene. It is removed from the site approximately every 4 days. They also generate several other ^{hazardous} waste streams, all of which ^{are} treated. They are exempt for this. See "Remarks" for explanation.

III. MANIFEST REQUIREMENTS (Subpart B)

	Yes	No	NI*	Remarks
() Does the operator have copies of the manifest available for review?	<u>X</u>	—	—	
(B) Do the manifest forms reviewed contain the following information? (If possible, make copies of, or record information from, manifests that do not contain the critical elements)				
1. Manifest document number?	<u>X</u>	—	—	viewed manifest from start-up of facility Sept. 1982 to Jan. 1983
2. Name, mailing address, telephone number, and EPA ID number of generator?	<u>X</u>	—	—	
3. Name and EPA ID Number of transporter(s)?	<u>X</u>	—	—	
4. Name, Address, and EPA ID Number of designated permitted facility and alternate facility?	<u>X</u>	—	—	

	Yes	No	NI*	Remarks
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<u>X</u>	—	—	_____
6. The total quantity of waste(s) and the type and number of containers loaded?	<u>X</u>	—	—	_____
7. Required certification?	<u>X</u>	—	—	_____
8. Required signatures?	<u>X</u>	—	—	_____
(C) Does the owner or operator submit exception reports when needed?	—	—	<u>X</u>	<u>none needed</u>

IV. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site)	<u>X</u>	—	—	<u>2 tanker trucks observed taking on loads of waste toluene - were placarded</u>
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required prior to movement of hazardous waste off-site)	<u>X</u>	—	—	_____
(C) If required, are placards available to transporter?	—	—	<u>X</u>	_____
(D) Pre-shipment Accumulation:				
1. Are containers marked with start of accumulation date?	—	—	<u>X</u>	<u>no containers</u>
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	—	—	<u>X</u>	<u>no containers</u>

*Not Inspected

Record the following information:

Tank capacity? _____ gallons

Tank diameter? _____ feet

Distance of tank from property line? _____ feet

(see tables 2-1 through 2-6 of NEPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance)

V Training, Emergency Procedures

	YES	NO	NI*	Remarks
A. Do Personnel training records include: (Effective 5/19/81)				there are 4 positions - 3 of them contain the specified information - all rec'd on the
1. Job Titles?	<u>X</u>	_____	_____	job training
2. Job Descriptions?	<u>X</u>	_____	_____	
3. Description of training?	<u>X</u>	_____	_____	
4. Records of training?	<u>X</u>	_____	_____	
5. Have facility personnel received required training by 5-19-81?	_____	_____	<u>X</u>	facility began operations in Sept '82 -
6. Do new personnel receive required training within six months?	<u>X</u>	_____	_____	
B. Preparedness and Prevention (Part 265, Subpart C)				
1. Maintenance and Operation of Facility:	_____	_____	_____	
a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	_____	<u>X</u>	_____	

1. Does the contingency plan contain the following:

a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part as applicable)

X

b. Arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §265.37?

X

c. Names, addresses, and phone numbers (Office and Home) of all persons qualified to act as emergency coordinator.

X

home addresses missing

d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities?

X

have list - but not physical descriptions location

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.

X

(If A was answered Yes, then complete the following as applicable.)

1. Exporting Hazardous waste,
has a generator:

a. Notified the Administrator
in writing?

b. Obtained the signature of the
foreign consignee confirming
delivery of the waste(s) in the
foreign country?

c. Met the Manifest requirements?

2. Importing Hazardous Waste,
has the generator:

Met the manifest requirements?

VIII. Remarks

Searle Food Resources, Inc. is leasing the closed Inolex facility in Park Forest South. In September, 1982, they began production of a low calorie sweetener. Three waste streams are generated:

1) mother liquor - a special waste sent to Chem Clear under IL Special Waste Permit No. 921884.

REMARKS:

2) spent methanol (F003) - approximately 4500-5000 gallons are generated daily - this facility has a distillation unit to recover the spent methanol via a "closed circuit" system from the production line to the distillation column and back to the production line. The spent methanol is exempt from regulation under Section 721.106 since it is being re-used. The treatment of the methanol is also exempt, under Section 725.101c6 as on-site treatment for which no storage nor transportation occurs prior to the treatment. The system also meets the definition of a totally enclosed treatment system, and would be exempt as such under Section 725.101c9. The still bottoms generated from treatment go directly to the waste water tank where they are treated and eventually discharge to Park Forest South Utilities treatment plant. Facility personnel state that no sludge is generated from this tank. This step in the treatment system is exempt as a totally enclosed treatment system. The discharge (point source) is exempt under Section 721.104a2.

3) spent toluene (F005) -

90% of spent toluene → separator tank → toluene layer goes to spent tank
aqueous layer goes to distillation tank

10% of spent toluene → distillation tank

still bottoms to waste water tank for treatment
distillation tank → aqueous layer (US751) to w.w.tr. tank

toluene to overhead tank → spent tank or transporting tanker truck
waste removed from spent tank via tanker truck to reclaimer

The separator tank is located inside and holds 3000 gallons. The spent tank is outside, underground, and holds 6000 gallons. The overhead tank is above ground, outside, holds 3000 gallons. The aqueous layer and still bottoms from the toluene distillation column are discharged directly, via a direct connection, to the waste water treatment tank, and eventually to the Park Forest South Utilities.

3125343281

Number Not In Service
7/20/90 Lmm.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
5HR-JCK-13

RE: ILD064393622 171741

AMERICAN CAN CO INOLEX DIVISION
ATTN: ENVIRONMENTAL COORDINATOR
2600 BOND ST
PARK FOREST SOUTH IL 60466

2600 BOND ST
PARK FOREST SOUTH IL 60466

Dear Illinois Hazardous Waste Handler:

Our records indicate that you have not yet submitted a response to the 1989 Waste Minimization Report package sent to you earlier this year.

Under the provisions of 40 CFR 262.41, 264.75 and 265.75 of the Resource Conservation and Recovery Act, you were required to submit your 1989 Waste Minimization Reports by March 1, 1990. If a site-specific extension was requested the due date would have been extended to no later than April 15, 1990. You must complete and submit your Waste Minimization Report to the address specified below.

Call (312) 886-4001 if you did not receive the above-specified package or if you have any questions.

U.S. EPA Region V
RCRA Activities
P.O. Box A-3587
Chicago, IL 60690

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Judy Kertcher".

Judy Kertcher
Acting Associate Director, Office of RCRA
Waste Management Division

19707204
STATE IDENTIFICATION NUMBER
(If Applicable)

ILD980793020
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
Form B Generator Inspection*
(40 CFR Part 262)

I. General Information:*

(A) Installation Name: Searle Food Resources, Inc.
(B) Street: 2600 Bond St.
(C) City: Park Forest South (D) State: FL (E) Zip Code: 60466
(F) Phone: 312-534-1030 (G) County: Will
(H) Date of Inspection: 2-24-83 Time of Inspection (From) 10:00 AM (To) 12:55 PM
(I) Weather Conditions: 34° cloudy

(J) Person(s) interviewed	Title	Telephone
<u>John Grove</u>	<u>Plant Mgr.</u>	<u>312-534-1030</u>
<u>Robert Strack</u>	<u>Project/Safety Eng.</u>	<u>312-534-1030</u>
<u>William Tolle</u>	<u>Mgr., Env. Eng.</u>	<u>312-470-6407</u>

(K) Inspection Participants	Agency/Title	Telephone
<u>J. Grove</u>	<u>"</u>	<u>"</u>
<u>R. Strack</u>	<u>"</u>	<u>"</u>
<u>W. Tolle</u>	<u>"</u>	<u>"</u>

(L) Preparer Information
B. Eleder

Name	Agency/Title	Telephone
<u>Bonnie Eleder</u>	<u>I.E.P.A. / Env. Prot. Spec.</u>	<u>312-345-9780</u>

Do not use this form if Generator is also a treatment, storage, and/or disposal facility.
Complete form "A" if the Generator is also a TSD facility.

II. BRIEFLY DESCRIBE SITE ACTIVITY

Searle is a generator of spent toluene. It is removed from the site approximately every 4 days. They also generate several other ^{hazardous} waste streams, all of which ^{are} treated. They are exempt for this. See "Remarks" for explanation.

III. MANIFEST REQUIREMENTS (Subpart B)

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	<u>X</u>	___	___	___
(B) Do the manifest forms reviewed contain the following information? (If possible, make copies of, or record information from, manifests that do not contain the critical elements)				
1. Manifest document number?	<u>X</u>	___	___	<u>viewed manifest from start-up of facility Sept. 1982 to Jan. 1983</u>
2. Name, mailing address, telephone number, and EPA ID number of generator?	<u>X</u>	___	___	___
3. Name and EPA ID Number of transporter(s)?	<u>X</u>	___	___	___
4. Name, Address, and EPA ID Number of designated permitted facility and alternate facility?	<u>X</u>	___	___	___

	Yes	No	NI*	Remarks
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<u>X</u>	—	—	_____
6. The total quantity of waste(s) and the type and number of containers loaded?	<u>X</u>	—	—	_____
7. Required certification?	<u>X</u>	—	—	_____
8. Required signatures?	<u>X</u>	—	—	_____
(C) Does the owner or operator submit exception reports when needed?	—	—	<u>X</u>	<u>none needed</u>

IV. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site)	<u>X</u>	—	—	<u>2 tanker trucks observed taking on loads of waste toluene - were placarded</u>
3) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required prior to movement of hazardous waste off-site)	<u>X</u>	—	—	_____
(C) If required, are placards available to transporter?	—	—	<u>X</u>	_____
(D) Pre-shipment Accumulation:				
1. Are containers marked with start of accumulation date?	—	—	<u>X</u>	<u>no containers</u>
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	—	—	<u>X</u>	<u>no containers</u>

*Not Inspected

	Yes	No	NI*	Remarks
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from facility's property line)?	—	—	X	<u>no containers</u>
4. If wastes are stored in tanks, are the tanks managed according to the following requirements:				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	X	—	—	
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	X	—	—	<u>one uncovered tank (aeration pond) - part of totally enclosed treatment system +</u>
c. Do continuous feed systems have a waste-feed cutoff?	—	—	X	<u>exempt from regulation (section 725.101(c)(9))</u> <u>not continuous feed</u>
d. Are required daily and weekly inspections done?	—	—	X	<u>inspections not written down</u>
e. Are reactive and ignitable wastes in tanks protected from sources of reaction and ignition, or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements)	X	—	—	<u>waste is ignitable</u>
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	—	—	X	<u>no incompatible wastes</u>
g. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?	—	—	X	

Record the following information:

Tank capacity? _____ gallons

Tank diameter? _____ feet

Distance of tank from property line? _____ feet

(see tables 2-1 through 2-6 of NEPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance)

V Training, Emergency Procedures

	YES	NO	NI*	Remarks
A. Do Personnel training records include: (Effective 5/19/81)				
1. Job Titles?	<u>X</u>	___	___	there are 4 positions - 3 of them contain the specified information - all rec'd on the job training
2. Job Descriptions?	<u>X</u>	___	___	
3. Description of training?	<u>X</u>	___	___	
4. Records of training?	<u>X</u>	___	___	
5. Have facility personnel received required training by 5-19-81?	___	___	<u>X</u>	facility began operations in Sept '82 -
6. Do new personnel receive required training within six months?	<u>X</u>	___	___	
B. Preparedness and Prevention (Part 265, Subpart C)				
1. Maintenance and Operation of Facility:	___	___	___	
a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	___	<u>X</u>	___	

2. If required, does this facility have the following equipment?

a. Internal communications or alarm systems?

X

heat detectors smoke detectors
pull boxes

b. Telephone or 2-way Radios at the scene of operations?

X

tele. + 2-way

c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

X

Indicate the volume of water and/or foam available for fire control

Sprinkler system

~100 extinguishers

3. Testing and Maintenance of Emergency Equipment:

a. Has the owner or operator established testing and maintenance procedures for emergency equipment?

X

inspections done by maintenance dept. - not written down

b. Is emergency equipment maintained in operable condition?

X

4. Has owner/operator provided immediate access to internal alarms (if needed)?

X

5. Is there adequate aisle space for unobstructed movement?

X

C. Contingency Plan and Emergency Procedure (Part 265, Subpart D)

1. Does the contingency plan contain the following:

a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part as applicable)

X

b. Arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §265.37?

X

c. Names, addresses, and phone numbers (Office and Home) of all persons qualified to act as emergency coordinator.

X

home addresses missing

d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities?

X

have list - but not physical descriptions location

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.

X

2. Are copies of the Contingency Plan available at site and local emergency organizations?

X

3. Emergency Coordinator

a. Is the facility emergency Coordinator identified?

X

b. Is coordinator familiar with all aspects of site operation and emergency procedures?

X

c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?

X

4. Emergency

If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures listed in §265.56?

X

none occurred

VI. RECORDKEEPING AND REPORTING
(Part 262, Subpart D)

(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?

X

facility began operations in Sept. 1982 have all documents since that time

(B) Has the generator submitted Annual Reports and Exception Reports as required?

X

none

VII. INTERNATIONAL SHIPMENTS
(Part 262 Subpart E)

(A) Has the installation imported or exported hazardous waste?

X

(If A was answered Yes, then complete the following as applicable.)

1. Exporting Hazardous waste,
has a generator:

- a. Notified the Administrator
in writing?
- b. Obtained the signature of the
foreign consignee confirming
delivery of the waste(s) in the
foreign country?
- c. Met the Manifest requirements?

2. Importing Hazardous Waste,
has the generator:

Met the manifest requirements?

VIII. Remarks

Searle Food Resources, Inc. is leasing the closed Inolex facility in Park Forest South. In September, 1982, they began production of a low calorie sweetener. Three waste streams are generated:

1) mother liquor - a special waste sent to Chem Clear under IL Special Waste Permit No. 921884.

REMARKS:

1) spent methanol (F003) - approximately 4500-5000 gallons are generated daily - this facility runs a distillation unit to recover the spent methanol via a "closed circuit" system from the production line to the distillation column and back to the production line. The spent methanol is exempt from regulation under Section 721.106 since it is being re-used. The treatment of the methanol is also exempt, under Section 725.101c6 as on-site treatment for which no storage nor transportation occurs prior to the treatment. The system also meets the definition of a totally enclosed treatment system, and would be exempt as such under Section 725.101c9. The still bottoms, generated from treatment go directly to the waste water tank where they are treated and eventually discharge to Park Forest South Utilities treatment plant. Facility personnel state that no sludge is generated from this tank. This step in the treatment system is exempt as a totally enclosed treatment system. The discharge (point source) is exempt under Section 721.104a2.

3) spent toluene (F005) -

90% of spent toluene → separator tank → toluene layer goes to spent tank
aqueous layer goes to distillation tank
10% of spent toluene → distillation tank
still bottoms to waste water tank for treatment
distillation tank → aqueous layer (US751) to w.w.tr. tank
toluene to overhead tank → spent tank or transporting tanker truck
waste removed from spent tank via tanker truck to reclaimer

The separator tank is located inside and holds 3000 gallons. The spent tank is outside, underground, and holds 6000 gallons. The overhead tank is above ground, outside, holds 3000 gallons. The aqueous layer and still bottoms from the toluene distillation column are discharged directly, via a direct connection, to the waste water treatment tank, and eventually to the Park Forest South Utilities.

VIII. Remarks cont.

As with the methanol above, much of this portion of the system is exempt from regulation. The spent toluene is not regulated because of the reclamation unit it goes through - as per Section 721.106. The actual treatment of the toluene is exempt from regulation for two reasons - this is on-site treatment for which no storage nor transportation occurs first, Section 721.101c6; and, this is a totally enclosed treatment system, section 725.101c9. The aqueous layer and still bottoms become exempt from regulation because they are sent for treatment in the open concrete wastewater treatment tank via a closed route which meets the totally enclosed treatment system definition. The discharge to the Park Forest South Utilities remains exempt from regulation as long as the toluene remains below 25 ppm - Section 721.103a2Dii.

To sum it all up, Searle is regulated as a generator of the hazardous waste, toluene. Approximately 5000 gallons are generated approximately every 4 days for transport off-site to a reclaimer. The following deficiencies were noted during the inspection:

- 1- written training record missing for one employee and dates of training not noted.
- 2- the home address for the emergency coordinator and the location and physical description of the emergency equipment were not included in the Contingency Plan.
- 3- no written tank inspections.
- 4- testing and maintenance of emergency equipment not documented.